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Document 345 Filed 06/14/21 Page 1 of 1 Proskauer Rose LLP Paul, Weiss, Rifkind, 1 of Herzfeld & Rubin, P.C. 125 Broad Street New York, NY 10004 (212) 471-8500

June 14, 2021

Honorable William H. Pauley, III United States District Court - Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl Street, Courtroom 20B New York, NY 10007-1312

Re: Baez, et al. v. New York City Housing Authority (NYCHA), No. 13-cv-8916 (WHP)

Dear Judge Pauley:

This letter is written on behalf of all parties in accordance with the Court's Memo Endorsement dated May 13, 2021, which directed the parties to submit a status letter by June 14, 2021.

As the Court is aware, the parties have been engaging in good faith negotiations regarding whether they intend to "propose either a further revised consent decree that includes all class members or a proposed pre-trial schedule for litigating this action." Those negotiations are still ongoing, and the parties require further time to determine whether they can reach mutually-agreeable terms. Accordingly, the parties propose submitting a further status report to the Court by July 12, 2021.

Respectfully submitted,

/s/ David A. Picon David A. Picon

cc: All counsel of record (via ECF)